

Message Text

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ACTION EUR-12

INFO OCT-01 IO-14 ISO-00 AID-05 CEA-01 CIAE-00 COME-00
EB-08 FRB-01 INR-10 NSAE-00 SP-02 STR-07 TRSE-00
LAB-04 SIL-01 OMB-01 DOTE-00 L-03 CTME-00 ITC-01
/071 W

-----081434 121229Z /64

R 121143Z MAY 78
FM AMEMBASSY BRUSSELS
TO SECSTATE WASHDC 6509
INFO USMISSION GENEVA

UNCLAS SECTION 01 OF 02 BRUSSELS 09106

USEEC

E.O.11652:N/A

TAGS: EEC, ETRD, EIND, ETRAN

SUBJECT: INTERNATIONAL STANDARD FOR MOTOR VEHICLE
IDENTIFICATION NUMBERS

1. INDUSTRIAL AFFAIRS OFFICIALS OF THE EUROPEAN COMMISSION HAVE INFORMED THE MISSION THAT THEY HAVE RECEIVED A LETTER FROM THE LIAISON COMMITTEE FOR AUTOMOBILE CONSTRUCTION (C.L.C.A.), AN EC-WIDE LOBBYING GROUP, COMPLAINING ABOUT U.S. PROPOSALS FOR MOTOR VEHICLE IDENTIFICATION NUMBERS WHICH WOULD BE INCOMPATIBLE WITH ISO AND EUROPEAN COMMISSION STANDARDS. THE C.L.C.A. MAINTAINS THAT FAILURE TO OBSERVE ISO STANDARDS COULD AFFECT EC AUTO IMPORTS TO THE U.S. AND U.S. AUTO EXPORTS TO COUNTRIES FOLLOWING ISO NORMS.

2. COMMISSION OFFICIALS BELIEVE THAT THIS IS A MINOR DIFFICULTY WHICH COULD BE EASILY RESOLVED BY SMALL ADJUSTMENTS BY THE U.S. TO CONFORM WITH ISO STANDARDS. THEY DO NOT INTEND TO MAKE AN OFFICIAL COMPLAINT AT THIS STAGE BUT MERELY WISH TO NOTIFY US OF EC INDUSTRY CONCERN
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AND THE COMMISSION'S INTEREST IN THIS PROBLEM. INFORMAL MISSION TRANSLATION OF C.L.C.A. COMMUNICATION TO THE COMMISSION FOLLOWS:

BEGIN TEXT:

IDENTIFICATION NUMBER OF VEHICLES

NOTING THE EXISTENCE IN A GOOD NUMBER OF COUNTRIES OF REGULATIONS OR PROPOSED REGULATIONS CONCERNING VEHICLE IDENTIFICATION NUMBERS AND AIMING AT AN EFFECTIVE CONTRIBUTION TO THE HARMONIZATION WORK CARRIED ON OR IN PROGRESS IN INTERGOVERNMENTAL BODIES, THE ISO BEGAN IN NOVEMBER 1971, STUDIES AIMED AT ELABORATING UNIFORM STANDARDS IN THIS AREA.

THESE IN-DEPTH STUDIES, IN WHICH AUTO CONSTRUCTORS AROUND THE WORLD PARTICIPATED ACTIVELY, CLIMAXED IN FEBRUARY 1976 WITH ISO STANDARDS 3779 AND 3780 WHICH RECEIVED UNANIMOUS SUPPORT.

THE TECHNICAL CONTENTS OF THESE STANDARDS WERE ADOPTED BY THE COMMISSION OF THE EUROPEAN COMMUNITIES AND SHOULD BE FORTHWITH INCLUDED IN A DIRECTIVE MODIFYING THE DIRECTIVE 76/114 CONCERNING LICENSE PLATES AND VEHICLE INSCRIPTIONS.

FURTHERMORE, THE WORK IN PROGRESS ON THE SAME SUBJECT AT THE ECE IN GENEVA, NOTABLY WITHIN THE SPECIAL GROUP ON HARMONIZATION OF REGULATIONS, IN WHICH A REPRESENTATIVE OF THE NATIONAL HIGHWAY TRAFFIC SAFETY ADMINISTRATION PARTICIPATES, WILL EVIDENTLY BE BASED ON ISO STANDARDS 3779 AND 3780.

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GIVEN THIS SITUATION, A CERTAIN NUMBER OF CONSTRUCTORS HAVE ALREADY TAKEN STEPS TO CONFORM TO THE ISO IDENTIFICATION NUMBER AND EVEN TO APPLY IT IN PRODUCTION.

HOWEVER, IN A DRAFT MODIFICATION OF FMZSS 115 (DOCKET NUMBER 1-22; NOTICE 4, FEDERAL REGISTER, VOL. 43, NUMBER 10 OF JANUARY 16, 1978) THE U.S. NHTSA HAS TAKEN THE STEP OF EXAMINING PROPOSALS WHICH LEAD TO AN IDENTIFICATION NUMBER NOT ONLY DIFFERENT BUT EVEN INCOMPATIBLE WITH THAT WHICH HAS BEEN ADOPTED BY THE ISO AND BY THE EC COMMISSION.

IN EFFECT THE NHTSA DRAFT OF JANUARY 16 LEADS US TO THE FOLLOWING OBSERVATIONS:

- LIKE THE ISO SYSTEM IT COMPRISES IN ALL 16 PLUS 1 EQUALS 17 ALPHABETIC-NUMERAL CHARACTERS.

- THE FIRST SECTION OF THREE CHARACTERS (WMI), IS THE SAME AS THE ISO SYSTEM.

- THE SECOND SECTION OF SIX CHARACTERS IS IDENTICAL
TO THAT OF THE ISO.
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- IT WAS FEARED FOR A WHILE THAT THE NHTSA WOULD
FOLLOW THE EXAMPLE OF THE V.E.S.C. AND ATTRIBUTE IDENTIFY-
ING SIGNIFICANCE TO EACH OF THE SIX CHARACTERS. THE
C.L.C.A. IS PLEASED TO NOTE THAT THE NHTSA RENOUNCED THIS
IDEA.

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ACTION EUR-12

INFO OCT-01 IO-14 ISO-00 AID-05 CEA-01 CIAE-00 COME-00
EB-08 FRB-01 INR-10 NSAE-00 SP-02 STR-07 TRSE-00
LAB-04 SIL-01 OMB-01 DOTE-00 L-03 CTME-00 ITC-01
/071 W

-----081460 121228Z /64

R 121143Z MAY 78
FM AMEMBASSY BRUSSELS
TO SECSTATE WASHDC 6510
INFO USMISSION GENEVA

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USEEC

- UNFORTUNATELY THE THIRD SECTION ONLY CONTAINS SEVEN
CHARACTERS IN PLACE OF THE EIGHT USED BY THE ISO.

THE FACT THAT THE MISSING CHARACTER WAS JUDGED USE-
LESS (ITS MEANING IS OPTIONAL IN THE ISO STANDARD) AND
THAT IT WAS REPLACED BY A SEVENTEENTH CHARACTER CALLED
"CHECK DIGIT" KEEPS THE NHTSA DRAFT FROM BEING ABSOLUTELY
INCOMPATIBLE WITH THE ISO SYSTEM.

IF THE PRESENT DRAFT OF THE NHTSA WERE TO GO INTO
EFFECT, THERE WOULD BE A SERIOUS DISADVANTAGE FOR EUROPEAN
CONSTRUCTORS EXPORTING TO THE UNITED STATES AND FURTHER-
MORE FOR AMERICAN CONSTRUCTORS EXPORTING TO ANY COUNTRIES
WHERE, AS IN THE CASE OF THE C.E.E., THE ISO IDENTIFICATION
NUMBER IS APPLIED. MOREOVER, AN APPARENT AND MISLEADING

SIMILARITY BETWEEN THE NUMBER ENVISAGED BY THE NHTSA AND
THE ISO NUMBER WOULD PRODUCE CONFUSION.

THE LIAISON COMMITTEE OF AUTOMOBILE CONSTRUCTORS OF
THE EUROPEAN COMMUNITY SINCERELY WISH THAT THE COMMISSION
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CONTACT RESPONSIBLE AMERICAN AUTHORITIES IN DRAWING ON
VIEWS EXPRESSED BY THE CONSTRUCTORS TO THE NHTSA TO TRY TO
INFLUENCE THE LATTER BODY TO ELIMINATE FROM ITS DRAFT THE
SMALL BUT NEVERTHELESS IMPORTANT DIFFERENCE WITH RESPECT TO
THE ISO NUMERATION. END TEXT.

3. ACTION REQUESTED: MISSION REQUESTS THAT RELEVANT
WASHINGTON AGENCIES CONSIDER THIS ISSUE AND ITS POSSIBLE
IMPACT ON INTERNATIONAL TRADE IN AUTOMOBILES. WE WOULD
APPRECIATE GUIDANCE FOR A REPLY TO THE COMMISSION.
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